

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GALDERMA LABORATORIES, L.P. and)	
NESTLÉ SKIN HEALTH S.A.)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 19-440 (LPS)
)	
AMNEAL PHARMACEUTICALS, LLC)	
and AMNEAL PHARMACEUTICALS)	
PVT. LTD.,)	
)	
Defendants.)	

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITHOUT PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Galderma Laboratories, L.P. and Galderma Skin Health S.A. (“Plaintiffs”), on the one hand, and Defendants Amneal Pharmaceuticals LLC and Amneal Pharmaceuticals Pvt. Ltd. (“Amneal,” and collectively with Plaintiffs, the “Parties”), on the other hand, hereby stipulate and agree that all claims, counterclaims and affirmative defenses asserted by the Parties against one another in the above-captioned action are hereby dismissed without prejudice, and without costs, disbursements, or attorneys’ fees to any party.

SO STIPULATED, this 20th day of August, 2020.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Jeremy A. Tigan

/s/ Anne Shea Gaza

Jack B. Blumenfeld (#1014)
Jeremy A. Tigan (#5239)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
(302) 658-9200
jblumenfeld@mnat.com
jtigan@mnat.com

Anne Shea Gaza (#4093)
Samantha G. Wilson (#5816)
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
agaza@ycst.com
swilson@ycst.com

Attorneys for Plaintiffs

Attorneys for Defendants

OF COUNSEL:

OF COUNSEL:

Gerald J. Flattmann, Jr.
Evan D. Diamond
Vanessa Y. Yen
KING & SPALDING LLP
1185 Avenue of the Americas
New York, NY 10036
(212) 556-2100

George C. Lombardi
Maureen L. Rurka
Kevin Warner
Karalena M. Guerrieri
Elizabeth E. Grden
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
(312) 558-5600

Eimeric Reig-Plessis
WINSTON & STRAWN LLP
101 California St.
San Francisco, CA 94111
(415) 591-1000
ereigplessis@winston.com

SO ORDERED this ____ day of _____, 2020.

Chief, United States District Judge